



# Grampian Autistic Society

## Privacy Policy

We, at Grampian Autistic Society (GAS), want everyone who supports us, or who comes to us for support, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The GAS Privacy Policy may change so please remember to check back from time to time. When we make any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

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## 1. Who we are

Here at GAS we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control, the processing of your personal information.

For further information about our privacy practices, please contact our Administrator by:

- Writing to GAS, 33-35 Carnie Drive, Aberdeen, AB253AN
- Calling us on 01224-277900
- Emailing to [admin@grampianautisticsociety.co.uk](mailto:admin@grampianautisticsociety.co.uk)

## 2. How we collect information about you

Everything we do we do to ensure that we can help people who are affected by autism to get the help and support they need. We want to make sure you receive the communications that are most relevant to you be it through emails, letters, phone calls, or visiting our website.

We collect information from you in the following ways:

**When you interact with us directly:** This could be if you ask us about our activities, register with us for training or an event, make a donation, ask a question about autism, apply for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, email us, visit our website or get in touch through the post, social media or in person.

**When you interact with us through third parties:** This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

**When you visit our website:** We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you.

Wherever possible we use anonymous information which does not identify individual visitors to our website.

## 3. Information we collect and why we use it

### Personal Information

Personal information we collect includes details such as your name, date of birth, email address, postal address, telephone number and information you or other professionals provide

in any communications between us. You will have given us this information whilst making a donation, registering for a service or in any of the other ways to interact with us.

We will mainly use this information:

- To process your donations or other payments, to claim Gift Aid on your donations and verify any financial transactions.
- To provide the services that you have requested.
- To update you with important administrative messages about your donation, an event or services you have requested.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to process your donation, sign you up for a particular event or provide the services you have requested.

We may also use your personal information:

- To contact you about our work and how you can support GAS (see section 5 on 'Marketing' below for further information).
- To invite you to participate in surveys or research.

### **Sensitive Personal Information**

If you share your personal experience, or the experiences of a relative, we may also collect this health information. If you provide us with any Sensitive Personal Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide to remain anonymous if you are happy with us to share your information with others and/or the media as part of telling the stories of those with autism in the area. You can also decide to remain anonymous if sharing Personal Information with staff members.

### **A special note about the Sensitive Personal Information we hold**

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you contact us at GAS or in other more general communications with us such as emails, you may choose to provide details of a sensitive nature.

We will only use this information:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.

- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- Where you have given us your express consent or otherwise clearly indicated to us that you are happy for us to share your information.

#### **4. Legal basis for using your information**

In some cases we will only use your personal information where we have your consent or because we need to use it in order to fulfill a contract with you (for example, because you have requested a service).

However, there are other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for GAS to process your information to help us to achieve our vision of ensuring that everyone experiencing autism gets the support they need.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

Some examples of where we have a legitimate interest to process your Personal information are where we contact you about our work via post, use your personal information for data analytics, conducting research to better understand who our supporters are, improving our services, for our legal purposes (for example, dealing with complaints and claims), or for complying with guidance from Office Scottish Charity Regulator or the Care Inspectorate.

#### **5. Marketing**

We will usually contact you about our work and how you can support GAS using the manner of contact you have agreed, be it phone, email or text message.

However, if you have provided us with your postal address we may send you information about our work and how you can support GAS by mail unless you have told us that you would prefer not to hear from us in that way.

You can update your choices or stop us sending you these communications at any time by contacting [admin@grampianautisticsociety.co.uk](mailto:admin@grampianautisticsociety.co.uk) or clicking the unsubscribe link at the bottom of the relevant communication.

#### **6. Sharing your Information**

The personal information we collect about you will mainly be used by our staff at GAS so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

GAS may however share your information with our trusted partners and suppliers who work with us on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes. Some examples of where we may share your information are with our fulfilment partners who help to create and send information to you to reduce our costs, with our partners who help us to process donations and claim Gift Aid and our partners who help us to manage our social media accounts.

### **Legal disclosure**

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce other agreements.

## **7. Keeping your information safe**

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites.

## **8. How long we hold your information for**

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

## **9. Your rights**

You have various rights in respect of the personal information we hold about you - these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Administrator at 33-35 Carnie Drive, Aberdeen, AB253AN,

by email at [admin@grampianautisticsociety.co.uk](mailto:admin@grampianautisticsociety.co.uk) and by phone on 01224-277900. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, <https://ico.org.uk/>:

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **Automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right to not be subjected to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfill every request.

## 10. Monitoring

Your communications with our teams (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.

To find out more about this policy and how we look after your personal information, contact our Administrator at [admin@grampianautisticsociety.co.uk](mailto:admin@grampianautisticsociety.co.uk) or on 01224-277900